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**UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R. G. HILL, et al,

Plaintiffs

vs.

**THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW, et al.,**

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

The Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

**PLAINTIFF'S SUPPLEMENTAL REQUEST
FOR JUDICIAL NOTICE OF DEFENDANT
SPIRO'S JUDICIAL ADMISSIONS AND
CONTRADICTORY STATEMENTS
(FRE 201)**

NO ORAL ARGUMENT REQUESTED

**PLAINTIFF'S SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE OF DEFENDANT SPIRO'S JUDICIAL
ADMISSIONS AND CONTRADICTORY STATEMENTS (FRE 201)**

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**PLAINTIFF’S SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE OF
DEFENDANT SPIRO’S JUDICIAL ADMISSIONS AND CONTRADICTORY
STATEMENTS (FRE 201)**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff respectfully submits this Supplemental Request for Judicial Notice pursuant to Federal Rule of Evidence 201 and controlling Ninth Circuit precedent, including *Khoja v. Orexigen Therapeutics, Inc.*, 899 F.3d 988 (9th Cir. 2018). Plaintiff requests the Court judicially notice significant admissions and contradictory statements explicitly contained within Defendant Spiro’s First Amended Answer to Plaintiff’s First Amended Complaint (Docket 41 filed May 9, 2023). These judicial admissions and contradictory denials substantively support Plaintiff’s claims and materially bear on pending dispositive motions currently before the Court.

In the alternative, should the Court decline to take judicial notice of the identified materials or facts, the Plaintiff respectfully requests that the Court explicitly recognize the substantial factual disputes these documents highlight and that factual resolution at the 12(b)(6) stage is improper.

I. JUDICIAL ADMISSIONS BY DEFENDANT SPIRO SUPPORTING PLAINTIFF’S CLAIMS

Plaintiff specifically requests judicial notice of Defendant Spiro’s explicit admissions (Paragraphs 78, 97, 99, 101, 183, 195, 323, 113) as they substantiate key elements of Plaintiff’s claims regarding improper record management, awareness of institutional noncompliance, contractual obligations, and retaliatory actions. Further, Plaintiff highlights Defendant’s contradictory and implausible denials (Paragraphs 108, 184, 320) as materially undermined by documented evidence in the record, notably Spiro’s acknowledgment of authorized tuition credit arrangements and systemic internal failures (see Exhibit D, Docket 285). Plaintiff respectfully requests that these admissions and contradictions be

1 judicially noticed as binding factual acknowledgments pursuant to Federal Rule of Evidence 201,
2 materially affecting all pending motions and discovery considerations.
3

4 5 **1. DUTY TO MAINTAIN ACCURATE RECORDS**

6 Defendant Spiro explicitly admits in Paragraph 78 PCL had a duty to maintain accurate records,
7 directly relevant to Plaintiff's allegations regarding improper recordkeeping and potential spoliation.
8

9 10 **2. CONTRACTUAL RELATIONSHIP**

11 Defendant explicitly admits in Paragraph 183 that a contractual relationship existed between
12 Plaintiff and Peoples College of Law (PCL), acknowledging PCL's contractual obligation to provide
13 educational services and Plaintiff's corresponding obligation to pay tuition.
14

15 **3. RIGHT TO INSPECT AND COPY DOCUMENTS**

16 Defendant explicitly admits in Paragraph 195 that Plaintiff was entitled to inspect and copy
17 specific documents held by PCL. This admission substantively supports Plaintiff's allegations of
18 procedural and substantive harm arising from Defendant's and PCL's improper withholding and
19 obstruction of access to educational records.
20

21 22 **4. IMPROPER TRANSCRIPT REVISIONS**

23 Defendant explicitly admits in Paragraph 323 that transcripts were retroactively revised by PCL
24 in the summer of 2022, changing awarded credits. This directly supports Plaintiff's allegations of
25 improper academic record management and unauthorized credit-hour modifications. Notably, this is
26 raised as an affirmative defense, ineligible for resolution at the motion to dismiss stage.
27
28

1 **5. ACKNOWLEDGMENT OF SPOILIATION CONCERNS**

2 Defendant admits explicitly in Paragraph 113 that Plaintiff explicitly raised concerns regarding
3
4 spoliation via email communication related to document management, affirming Defendant's actual
5 knowledge of Plaintiff's expressed concerns about evidence mishandling and preservation issues.

6 **II. CONTRADICTORY AND IMPLAUSIBLE STATEMENTS BY DEFENDANT**

7 **1. ASSERTS THAT STATE BAR PERSONNEL MADE EXPLICIT STATEMENTS**
8 **THAT PCL WAS UNABLE TO CHANGE UNIT ALLOCATIONS**

9 Defendant asserts in Paragraph 99 that Ms. Leonard explicitly stated PCL could not change unit
10 allocations because it would constitute a major regulatory change, directly supporting claims that
11 Spiro and PCL were aware of the accreditation violations and deliberately ignored corrective actions.

12
13 **2. ALLEGED NONPAYMENT OF TUITION**

14 Defendant asserts in Paragraph 184 that Plaintiff repeatedly failed to timely pay tuition, despite
15 extensive financial documentation in Plaintiff's possession demonstrating consistent and timely
16 payments, seeking of arrangements or attempts to pay. Defendant's allegation is contradicted by
17 documented evidence, highlighting credibility concerns.
18

19
20 **3. DENIAL OF RETALIATORY MISCONDUCT**

21 In Paragraph 108, Defendant broadly denies misconduct intended to silence or retaliate against
22 Plaintiff. This denial is contradicted by extensive documentary evidence already on the record,
23 clearly demonstrating repeated retaliatory actions and attempts by Defendant and other PCL agents to
24 inhibit Plaintiff's rights and lawful complaints.
25

26
27 **4. MISREPRESENTATION OF PLAINTIFF'S ACADEMIC EFFORTS**
28

Defendant alleges in Paragraph 320 that Plaintiff improperly sought shortcuts in education and tuition waivers, claims directly refuted by extensive documentation and Plaintiff's established record of compliance with educational standards, procedural rules, and contractual obligations.

III. PROCEDURAL AND EVIDENTIARY SIGNIFICANCE

These admissions and contradictions hold substantial procedural significance under Federal Rules of Civil Procedure, particularly Rule 12(d), as they represent judicially noticeable facts and undisputed admissions establishing key elements of Plaintiff's claims, including breach of contract, procedural misconduct, and evidence mismanagement. The contradictory statements further underscore serious credibility and evidentiary concerns requiring discovery and procedural examination.

These additional admissions and contradictions materially support and reinforce Plaintiff's claims related to systemic institutional negligence, administrative malfeasance, and retaliatory misconduct. Judicial notice of these explicit admissions and denials serves the critical function of clarifying the record and establishing foundational elements of your legal theories and factual narrative, particularly concerning contract breaches, fiduciary breaches, and retaliatory conduct.

IV. OUTSTANDING REQUESTS FOR JUDICIAL NOTICE

As of the time of this submission on June 13, 2025, the following additional requests for judicial notice remain unresolved:

- a. Docket 276: PLAINTIFF'S NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE (filed 4/23/2025)

- b. Docket 279: PLAINTIFF’S NOTICE OF ERRATA RE: PLAINTIFF’S NOTICE OF CLARIFICATION AND SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DOCKET 272 (filed 4/25/2025)
- c. Docket 280: PLAINTIFF’S OPPOSITION TO DEFENDANT SPIRO’S REQUEST FOR JUDICIAL NOTICE (DKT. 278) AND NOTICE OF REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO’S LACK OF GOVERNANCE AUTHORITY (filed 4/28/2025)
- d. Docket 298: PLAINTIFF’S REQUEST FOR JUDICIAL NOTICE AND SUPPLEMENTAL BRIEF IN SUPPORT OF RULE 59(e) MOTION TO ALTER OR AMEND JUDGMENT (filed 5/9/2025)
- e. Docket 301: PARTIAL OPPOSITION AND NOTICE OF QUALIFIED RESPONSE TO DEFENDANT SPIRO’S REQUEST FOR JUDICIAL NOTICE (DKT. 296); SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE (filed 5/11/2025)

Plaintiff notes that these filings directly implicate the factual integrity of Defendant’s representations to the Court and are essential to ensuring a complete record. Their continued omission from adjudication, while dispositive and procedural rulings continue to be issued, supports an appearance of selective consideration inconsistent with impartial judicial process.

Accordingly, Plaintiff respectfully requests an update or ruling on these submissions or, in the alternative, that the Court clarify its intent regarding whether these filings are being considered as part of the record.

V. LEGAL STANDARD

Judicial notice may be taken of facts “not subject to reasonable dispute” when they are “capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). Public records and reports published by government agencies, including licensing authorities, are appropriate for judicial notice. (*Khoja v. Orexigen Therapeutics, Inc.*, 899 F.3d 988, 999 (9th Cir. 2018)).

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Under Rule 59(e), a district court may alter or amend a judgment if presented with:

- a. Newly discovered or previously unavailable evidence;
- b. A clear error of law or fact;
- c. The need to prevent manifest injustice. (*Allstate Ins. Co. v. Herron*, 634 F.3d 1101, 1111 (9th Cir. 2011); *School Dist. No. 1J v. ACandS, Inc.*, 5 F.3d 1255, 1263 (9th Cir. 1993)).

The documents and facts identified and contained therein meet this standard. They were introduced both prior to and after the Court's dispositive judgment and are directly material to Plaintiff's allegations. The documents are material and directly relevant to assessment of Plaintiff's allegations in the operative Fourth Amended Complaint and proposed Fifth Amended Complaint under current consideration.

Moreover, several of the pending judicial notice filings, specifically Dkts. 276, 280, and 301, contain evidence that directly rebuts factual representations made by Defendants in support of their dispositive motion(s). Failure to resolve these filings prior to issuing or reaffirming judgment implicates core principles of procedural due process and undermines the integrity of any dispositive ruling that purports to rely on an accurate record.

The Ninth Circuit has consistently held that a district court abuses its discretion when it fails to consider evidence or requests properly submitted before judgment, particularly when those submissions bear directly on the factual or legal issues underlying the claims or defenses at issue. "**A district court abuses its discretion when it bases its ruling on an erroneous view of the law or on a clearly erroneous assessment of the evidence.**" *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 405 (1990) ("A district court abuses its discretion when it bases its decision on an erroneous view of the law or a clearly erroneous assessment of the facts."); see also *Lee v. City of Los Angeles*, 250

1 F.3d 668, 689 (9th Cir. 2001) (reversing dismissal where the district court took judicial notice of
2 public records but improperly relied on them for the truth of disputed facts).

3
4 Critically, a court may not ignore properly filed judicial notice requests or factual materials
5 that, if credited, would materially alter the adjudication of the parties' rights. Motions to dismiss
6 under Rule 12(b)(6) are generally confined to the four corners of the complaint. When a court
7 considers evidence outside the pleadings, it must ordinarily convert the motion into one for summary
8 judgment under Rule 56 and afford the non-moving party an opportunity to respond. *See* Fed. R. Civ.
9 P. 12(d); *Parrino v. FHP, Inc.*, 146 F.3d 699, 706 n.4 (9th Cir. 1998). There is a narrow exception: a
10 district court may consider documents attached to the complaint, documents incorporated by
11 reference, or matters subject to judicial notice, without triggering conversion. *United States v.*
12 *Ritchie*, 342 F.3d 903, 907–08 (9th Cir. 2003).

13
14
15 However, where a court considers matters outside the pleadings that are not appropriately
16 subject to judicial notice, and does not expressly exclude them, it must treat the motion as one for
17 summary judgment. *See Whittlestone, Inc. v. Handi-Craft Co.*, 618 F.3d 970, 974 n.1 (9th Cir. 2010);
18 Fed. R. Civ. P. 12(d). To do otherwise risks undermining Rule 12's procedural safeguards and
19 prejudices the plaintiff's right to fair adjudication. Where, as here, a plaintiff properly submits
20 judicially noticeable materials, particularly those that rebut contested factual assertions or clarify
21 governing institutional relationships, refusal to consider them or selective exclusion without proper
22 conversion constitutes reversible error.

23
24
25 Failure to adequately engage and timely address such materials not only compromises the
26 factual record but deprives the moving party of a full and fair adjudication under Rule 59(e) and
27 60(b).
28

1 Accordingly, the Court has both a discretionary and procedural duty to rule on the above-
2 referenced filings, each of which constitutes part of the evidentiary predicate for Plaintiff's operative
3 allegations and ongoing Rule 59(e) and Rule 60(b) rights. To further defer or disregard them entirely
4 would not only deprive Plaintiff of a full and fair opportunity to be heard, but would also risk
5 institutional error reviewable on appeal.
6

7
8
9 **VI. PROCEDURAL CONTEXT AND OMISSION OF PENDING JUDICIAL NOTICE**
10 **REQUESTS**

11 Despite the Court's statement in its May 6, 2025 Order (Dkt. 291) that it would consider all
12 submissions identified in Plaintiff's Request for Administrative Update (Dkt. 284) "as warranted,"
13 there is no reference in Docket 312 to Plaintiff's Supplemental Requests for Judicial Notice filed on
14 April 23, 25, and 28, 2025 (Dkts. 276, 279, 280). These filings, timely submitted and ultimately
15 docketed, contain official records and declarations bearing directly on Plaintiff's claims of improper
16 governance, factual misrepresentations by Defendants, including Defendant Spiro, and new
17 documentation confirming the State Bar's continued oversight posture regarding non-ABA law
18 schools. Their omission raises serious questions about whether relevant evidence was improperly
19 excluded or overlooked in the denial of reconsideration.
20
21

22 In *Lee v. City of Los Angeles*, 250 F.3d 668, 688–89 (9th Cir. 2001), the Ninth Circuit held that it
23 is an abuse of discretion for a district court to disregard matters of judicial notice when resolving
24 dispositive motions. Notably, the present Court did not address whether it evaluated these requests
25 before reaffirming dismissals that, under Federal Rule of Civil Procedure 12(b)(6), should not rest on
26 omitted or selectively evaluated evidence.
27
28

1 Plaintiff raises this now not merely to preserve the record, but to preclude recurrence of
2 procedural deficiencies that may otherwise necessitate appellate correction.
3

4 **VII. PRESERVATION OF RULE 59(E) AND RULE 60(B) RIGHTS**

5 The Plaintiff preserves all rights under Federal Rule of Civil Procedure 12(d), Rule 59(e) to
6 amend the judgment on grounds of newly discovered evidence, clear legal error, or the need to
7 prevent manifest injustice (*Allstate Ins. Co. v. Herron*, 634 F.3d 1101, 1111 (9th Cir. 2011)).
8 Additionally, Plaintiff preserves rights under Fed. R. Civ. P. 60(b), particularly subsections (1), (2),
9 and (6), based on the Court's failure to acknowledge dispositive evidence properly submitted before
10 judgment was reaffirmed.
11
12

13 In particular, the failure to consider Dockets 276, 279, and 280 constitutes either mistake,
14 inadvertence, or excusable neglect under Rule 60(b)(1); newly discovered evidence under Rule
15 60(b)(2); and a compelling justification under the catch-all equity provision of Rule 60(b)(6),
16 especially where the unacknowledged evidence contradicts the Court's assumption that Plaintiff had
17 not plausibly alleged intentional discrimination or supervisory awareness.
18
19

20 Here, Plaintiff asserts that delayed disclosure, untimely review or record unavailability impaired
21 the Court's ability to render a judgment based on a complete evidentiary record. Judicial review
22 based on an incomplete administrative record constitutes clear error under Rule 59(e). (*See Metcalf v.*
23 *Daley*, 214 F.3d 1135 (9th Cir. 2000), where the court emphasized the necessity of objective
24 evaluation in administrative decision-making processes.) Because the Court facially appears to have
25 failed to review or disregarded available submissions confirming core factual allegations previously
26 dismissed as speculative, reconsideration is not only warranted it is necessary to preserve procedural
27 integrity.
28

1 Courts in the Ninth Circuit have consistently held that where material evidence is submitted and
2 not considered due to docketing irregularities or oversight, relief is warranted to prevent manifest
3 injustice. See *Allstate Ins. Co. v. Herron*, 634 F.3d 1101, 1111 (9th Cir. 2011); *School Dist. No. 1J v.*
4 *ACandS, Inc.*, 5 F.3d 1255, 1263 (9th Cir. 1993).

6
7 Notably, without making any allegation of impropriety, Plaintiff respectfully reiterates that
8 material filings in Docket 290, submitted via EDSS on April 22, 2025, supported by confirmed
9 tracking numbers, remained undocketed at the time the Court issued a dispositive ruling.

10
11 Regardless of subsequent docket activity or administrative explanation, the procedural
12 significance of these submissions lies in their timely transmission and substantive relevance to
13 pending motions.

14
15 Plaintiff expressly preserves all procedural objections arising from adjudication based on an
16 incomplete record, including any attempt, formal or implied, to retroactively validate dispositive
17 rulings without timely consideration of the submissions referenced herein.

18
19 **VIII. FAILURE TO ADDRESS THIS EVIDENCE RISKS FORECLOSING**
20 **APPELLATE REVIEW ON AN INCOMPLETE RECORD**

21 The Court's explicit consideration and resolution of judicially noticeable materials serves not
22 only the immediate interest of justice but also the appellate function of the judicial system. The Ninth
23 Circuit has repeatedly held that meaningful appellate review depends critically on district courts
24 establishing a clear record as to what evidence and judicially noticeable documents were evaluated in
25 reaching dispositive rulings. A failure to expressly resolve judicial notice requests, particularly when
26 tied directly to the core factual and procedural issues of the litigation, creates a substantial risk that
27
28

1 appellate review will be compromised, or at minimum, complicated by ambiguity regarding the scope
2 of the district court's analysis.
3

4 Furthermore, in cases involving pro se litigants, procedural transparency assumes heightened
5 importance. The Ninth Circuit has consistently instructed district courts to afford liberal construction
6 to evidentiary submissions and judicial notice requests made by pro se plaintiffs, recognizing their
7 vulnerability to procedural disadvantages. A district court's failure to provide a clear, reasoned
8 disposition of such requests not only prejudices the litigant but risks undermining broader confidence
9 in judicial fairness and equity. Thus, preserving the full evidentiary record now, through affirmative
10 rulings on all outstanding judicial notice requests, protects not only Plaintiff's appellate rights but the
11 broader integrity and transparency of the judicial process.
12
13

14 Should the Court decline to take judicial notice of the identified materials or facts contained
15 therein, many of which are public records and government-issued reports, it risks entrenching a
16 procedurally incomplete record that materially prejudices Plaintiff's rights on appeal. As the Ninth
17 Circuit has consistently recognized, dispositive rulings made without full consideration of judicially
18 noticeable facts or properly submitted evidence can constitute reversible error. (*Lee v. City of Los*
19 *Angeles*, 250 F.3d 668, 688–89 (9th Cir. 2001); *Jones v. Blanas*, 393 F.3d 918, 927 (9th Cir. 2004),
20 insofar as it emphasizes the importance of considering pro se evidentiary submissions).
21
22

23 Failure to address these materials not only undermines the factual integrity of this Court's
24 rulings, but also risks insulating procedural irregularities from meaningful appellate scrutiny,
25 particularly where, as here, the record reflects repeated delays in docketing and supports the
26 appearance of selective attention to FRE 201 requests. Plaintiff respectfully submits that preserving
27 the integrity of the judicial process requires the Court to consider the full evidentiary record now,
28 rather than forcing appellate correction later.

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1 In *Lee v. City of Los Angeles*, 250 F.3d 668, 688–89 (9th Cir. 2001), the Ninth Circuit made
2 clear that it is an abuse of discretion for a district court to disregard matters of judicial notice when
3 resolving Rule 12(b)(6) motions. This principle is reaffirmed in *Khoja v. Orexigen Therapeutics, Inc.*,
4 899 F.3d 988, 999 (9th Cir. 2018), which emphasizes the importance of evaluating judicially
5 noticeable documents in their entirety and cautions against cherry-picking. The failure to address
6 such materials, particularly when advanced in pre or post-judgment briefing, risks both factual error
7 and appellate insulation of flawed rulings.
8
9

10 11 **IX. CONCLUSION**

12 Accordingly, Plaintiff respectfully requests that the Court expressly take judicial notice under
13 Federal Rule of Evidence 201 of the judicial admissions and contradictions detailed above from
14 Defendant Spiro’s First Amended Answer (Docket 41, filed May 9, 2023). Plaintiff further requests
15 these judicially noticed admissions and contradictions be explicitly incorporated into the record and
16 formally considered by the Court in all forthcoming hearings, rulings, or dispositive orders in this
17 matter.
18
19

20 Additionally, the Court’s silence on these properly docketed judicial notice requests effectively
21 establishes a procedural ambiguity detrimental to appellate clarity. The Ninth Circuit has cautioned
22 district courts against creating conditions where appellate courts must speculate about whether key
23 factual determinations or documentary evidence were overlooked or implicitly rejected. By clearly
24 stating the scope of evidence considered in its dispositive analyses, this Court can ensure procedural
25 clarity and facilitate effective appellate scrutiny, reinforcing the accountability and reliability of
26 judicial decision-making.
27
28

1 Therefore, to avert procedural confusion and preserve the integrity of the judicial record, Plaintiff
2 urges this Court to explicitly resolve each of the outstanding judicial notice requests. If the Court
3 elects not to grant judicial notice, Plaintiff respectfully requests an affirmative statement confirming
4 that these materials were considered and the reasons for their exclusion, ensuring transparency and
5 enabling meaningful appellate review consistent with established judicial norms.
6

7
8 These materials are directly relevant to Plaintiff's claims and satisfy the standards of Federal Rule
9 of Evidence 201 and Rules 59(e) and 60(b). Their omission from the Court's analysis not only risks
10 an incomplete appellate record but undermines confidence in the integrity of the adjudicative process.
11

12 When a court does not affirmatively resolve properly submitted and docketed requests tied to
13 dispositive outcomes, it effectuates a constructive denial, silently foreclosing consideration while
14 avoiding the procedural clarity required for meaningful review. This omission not only prejudices
15 Plaintiff but creates uncertainty as to whether key evidence was evaluated or simply bypassed.
16

17 Accordingly, the Plaintiff respectfully renews his request that the Court take judicial notice of the
18 submitted materials, reconsider, as warranted, any rulings affected by their omission, and preserve a
19 full and reviewable record in accordance with governing law and principles of fundamental fairness.
20 In the alternative, Plaintiff requests clarification as to whether these materials were reviewed and
21 incorporated into the Court's prior rulings.
22

23
24 In the alternative, should the Court decline to take judicial notice of the identified materials or
25 facts, Plaintiff respectfully requests that the Court explicitly recognize the substantial factual disputes
26 these documents highlight. Consistent with Ninth Circuit authority, including *Khoja v. Orexigen*
27 *Therapeutics, Inc.*, 899 F.3d 988, 999 (9th Cir. 2018), factual conflicts demonstrated by these
28 admissions and contradictory statements preclude dismissal under Rule 12(b)(6) and warrant further

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1 discovery under Rule 12(d). Plaintiff urges the Court to acknowledge that these unresolved factual
2 disputes materially affect the viability of Plaintiff's claims, making any resolution at this procedural
3 stage inappropriate without discovery.
4

5 Respectfully submitted,

6 Dated: June 13, 2025
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12 Todd R. G. Hill
13 Plaintiff, Pro Se

14 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**
15

16 The undersigned party certifies that this brief contains 3,329 words, which complies with the 7,000-
17 word limit of L.R. 11-6.1.

18 Respectfully submitted,

19
20
21


22 June 13, 2025
23 Todd R.G. Hill
24 Plaintiff, in Propria Persona

25 **Plaintiff's Proof of Service**

26 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-
27 3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a
28 document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the

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1 CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court
2 and (2) all pro se parties who have been granted leave to file documents electronically in the case
3 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service
4 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.
5 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal
6 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.
7

8 Respectfully submitted,
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13 June 13, 2025
14 Todd R.G. Hill
15 Plaintiff, in Propria Persona
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